

# EXHIBIT 1



**U.S. Department of Justice**

United States Attorney  
District of Minnesota

600 United States Courthouse  
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Minneapolis, MN 55415

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January 23, 2020

Shannon Elkins  
James Becker  
Assistant Federal Defenders  
107 U.S. Courthouse  
300 South Fourth Street  
Minneapolis, Minnesota 55415

**VIA EMAIL**

Re: *United States v. Michael Hari*  
Criminal No. 18-150 (DWF/HB)

Dear Ms. Elkins and Mr. Becker:

This letter is to notify you that the Government will offer testimony from the following experts, or fact witnesses, who may be characterized as experts, at the upcoming trial in the above-referenced case:

1. **Robert F. Mothershead:** The Government will call Robert Mothershead, who is a Forensic Chemist at the Federal Bureau of Investigation in Quantico, Virginia. His qualifications are detailed in his Curriculum Vitae, which was disclosed to you by email on January 22, 2020. The Government expects Mr. Mothershead will testify consistent with his Explosives Chemistry report dated August 17, 2017 regarding his determinations. This report, and some of the relevant case record reports, were previously disclosed to you on February 27, 2019. In addition, as you know, the Government notified you this week that Mr. Mothershead's laboratory notes involving the basis of his opinion were available to you on physical discs in our office. We will now also provide you with copies of these notes contemporaneous with this letter.
2. **David P. Defusco:** The Government will call David Defusco who is an Explosive and Hazardous Device Examiner Specialist at the Federal Bureau of Investigation in Quantico, Virginia. His qualifications are detailed in his Curriculum Vitae,

which was disclosed to you by email on January 22, 2020. The Government expects Mr. Defusco will testify consistently with his Explosives Device report dated August 28, 2017. This report, and some of the relevant case record reports, were previously disclosed to you on February 27, 2019. In addition, as you know, the Government notified you this week that Mr. Defusco's laboratory notes involving the basis of his opinion were available to you on physical discs in our office. We will now also provide you with copies of these notes contemporaneous with this letter.

3. **Amanda N. Bakker:** The Government may call Amanda Bakker who is a Forensic DNA Biologist at the Federal Bureau of Investigation in Quantico, Virginia. Her qualifications are detailed in her Curriculum Vitae, which was disclosed to you by email on January 22, 2020. The Government expects Ms. Bakker will testify consistently with her Nuclear DNA Examination reports dated June 1, 2018, August 8, 2019, and August 9, 2019, regarding her determinations. These reports, and some of the relevant case record reports, were previously disclosed to you on either February 27, 2019 or on December 27, 2019. In addition, the government notified you this week that Ms. Bakker's laboratory notes involving the basis of her opinion were available to you on physical discs in our office. We will now also provide you with copies of these notes contemporaneous with this letter.
4. **Raleigh W. Parrott II:** The Government may call Raleigh Parrott who is a Forensic Chemist at the Federal Bureau of Investigation in Quantico, Virginia. His qualifications are detailed in his Curriculum Vitae, which was disclosed to you by email on January 22, 2020. The Government expects Mr. Parrott will testify consistently with his Explosives Chemistry reports dated January 5, 2018, June 13, 2018, June 15, 2018, September 25, 2018, and December 7, 2018. These reports, and some of the relevant case record reports, were previously disclosed to you either on February 27, 2019 or on December 27, 2019. In addition, as you know, the Government notified you this week that Mr. Parrott's laboratory notes involving the basis of his opinion were available to you on physical discs in our office. We will now also provide you with copies of these notes contemporaneous with this letter.
5. **Dr. Jason Barrow:** The Government may call Dr. Jason Barrow who is a Hazardous Device Examiner at the Federal Bureau of Investigation in Quantico, Virginia. His qualifications are detailed in his Curriculum Vitae, which was disclosed to you by email on January 22, 2020. The Government expects Mr. Barrow will testify consistently with his Explosives Device reports, two dated October 22, 2019, and one dated October 17, 2019. The October 22, 2019 reports, and some of the relevant case records, were disclosed to you January 15, 2020.

The October 17, 2019 report will be disclosed to you contemporaneous with this letter. The Government, however, is awaiting Dr. Barrow's laboratory notes. We will provide this information immediately upon receipt.

6. **Jacqueline Slebrch:** The Government will call Jacqueline Slebrch, who is a Physical Scientist/Forensic Examiner with the Latent Print Operations Unit at the Federal Bureau of Investigation Quantico, Virginia. Her qualifications are detailed in her Curriculum Vitae, which was disclosed to you by email on January 22, 2020. The Government expects Ms. Slebrch will testify consistently with her Latent Print reports dated August 8, 2017, October 12, 2018 and August 20, 2019. These reports, and some of the relevant case record reports, were previously disclosed to you on either February 27, 2019 or on December 27, 2019. The Government, however, is awaiting Ms. Slebrch's laboratory notes. We will provide you this information immediately upon receipt.
7. **Ashely M. Baloga:** The Government may call Ashley Baloga, who is a Physical Scientist/Forensic Examiner with the Trace Evidence Unit at the Federal Bureau of Investigation Quantico, Virginia. Her qualifications are detailed in her Curriculum Vitae, which was disclosed to you by email on January 22, 2020. The Government expects Ms. Baloga will testify consistently with her Trace Hair/Fibers report dated August 8, 2017. This report, and some of the relevant case record reports, were previously disclosed to you on February 27, 2019. Ms. Baloga, however, is finalizing her report regarding any hair comparison results with respect to your client's hair sample. We will disclose that report immediately upon receipt. If Defendant's hair is found to be consistent with the recovered hair sample, we will call Ms. Baloga to testify consistently with her reports.
8. **Nicole M. Bagley:** The Government may call Nicole Bagley, who is a Physical Scientist/Forensic Examiner with the Latent Print Unit at the Federal Bureau of Investigation Quantico, Virginia. Her qualifications are detailed in her Curriculum Vitae, which was disclosed to you by email on January 22, 2020. The Government expects Ms. Bagley will testify consistently with her Latent Prints report dated October 15, 2018. This report, and some of the relevant case record reports, were previously disclosed to you on February 27, 2019. The Government, however, is awaiting Ms. Bagley's laboratory notes. We will provide this information immediately upon receipt.
9. **Derrick S. McClarin:** The Government may call Derrick McClarin who is a Physical Scientist/Forensic Examiner at the Federal Bureau of Investigation in Quantico, Virginia. His qualifications are detailed in his Curriculum Vitae, which was disclosed to you by email on January 22, 2020. The Government expects Mr. McClarin will testify consistently with his Firearms/Toolmarks report dated

October 25, 2018. This report, and some of the relevant case record reports, were previously disclosed to you on February 27, 2019. In addition, as you know, the Government notified you this week that Mr. McClarin's laboratory notes involving the basis of his opinion were available to you on physical discs in our office. We will also provide you with copies of these notes contemporaneous with this letter.

10. **Greg A. Catey:** The Government will call FBI Special Agent Greg Catey, a Cellular Analysis Survey Team ("CAST") investigator and analyst with the Federal Bureau of Investigation in Springfield, Illinois. His qualifications are detailed in his Curriculum Vitae, which was previously disclosed on January 15, 2020. Although Mr. Catey is a fact witness, he may give what could be characterized as expert testimony. Mr. Catey will testify concerning his review of telephone communication evidence. The Government expects Agent Catey will testify consistently with his CAST report dated May 23, 2019, previously disclosed on December 27, 2019. This CAST report will be updated for trial presentation. You have received the underlying phone records that form the basis of Agent Catey's analysis.
11. **Vicki Klemz:** The Government will call Vicki Klemz, a Computer Forensic Examiner at the FBI's Minneapolis Field Office. Although Ms. Klemz is a fact witness, she may give what could be characterized as expert testimony. Ms. Klemz will testify as a fact witness concerning the processing and examination of electronic evidence obtained from various seized electronic devices. She may also testify about computer forensics in general, the structure of the electronic devices, and the way information is organized and stored in electronic devices. Ms. Klemz may offer opinions related to the location and date of evidence found on the electronic devices. She may also offer testimony about the Internet in general, Internet artifacts on electronic devices, and/or evidence on the devices that may be connected to the use of the Internet. This testimony is based on her forensic examination of the devices and on her training and experience. Her qualifications are detailed in her Curriculum Vitae, which was disclosed to you by email on January 22, 2020.
12. **Hazardous Device Technicians Ben Mansur, Andrew Risdall and James Picray:** The Government will call Ben Mansur and Andrew Risdall who are Police Officers with the Bloomington Police Department. The Government may also call James Picray, a Special Agent with the FBI. Both officers and Agent Picray responded to the scene of the bombing at the Mosque and all are trained as Bomb Technicians. Although the Government views these law enforcement officers as primarily fact witnesses, they may give testimony that could be characterized as expert testimony. Accordingly, out of an abundance of caution, the Government gives notice of these witnesses as "experts." Their qualifications

are detailed in their Curriculum Vitaes, which were disclosed to you by email on January 22, 2020. The Government expects the officers will testify regarding their observations at the Dar Al Farooq Islamic Center on August 5, 2017 and consistently with photographs and the reports of Bloomington police officers previously disclosed to you on February 27, 2019.

If the Government elects to call additional expert witnesses, based either on further trial preparation or on your expert disclosure, we will provide you with notice of the same.

Very truly yours,

ERICA H. MacDONALD  
United States Attorney

*s/ Julie E. Allyn*

BY: Julie E. Allyn  
Assistant U.S. Attorney

John Docherty  
Assistant U.S. Attorney

EXPERT	REPORT DATES	BATES #	DATE DISCLOSED
Robert Mothershead	8/17/2017	00001502	2/27/2019
David Defusco	8/28/2017	00001651	2/27/2019
Amanda Bakker	6/1/2018	00015673	2/27/2019
	8/8/2019	00023618	12/27/2019
	8/9/2019	00023861	12/27/2019
Raleigh Parrott II	1/5/2018	00010243	12/27/2019
	6/13/2018	00015681	2/27/2019
	6/15/2018	00015974	2/27/2019
	9/25/2018	00019666	12/27/2019
	12/7/2018	00019896	2/27/2019
Dr. Jason Barrow	10/22/2019	00024657	1/15/2020
	10/22/2019	00024655	1/15/2020
	10/17/2019		Disclosed with Expert Disclosure letter
Jacqueline Slebrch	8/8/2017	00000461	2/27/2019
	10/12/2018	00019741	2/27/2019
	8/20/2019	00024254	12/27/2019
Ashley Baloga	8/8/2017	00000375	2/27/2019
Nicole Bagley	10/15/2018	00019762	2/27/2019
Derrick McClarin	10/25/2018	00019824	2/27/2019
Greg Catey	5/23/2019	00023296	12/27/2019
Vicki Klemz	No reports		
Ben Mansur	Bloomington PD Reports	00000138	2/27/2019
Andrew Risdall			
James Picray			